

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

# REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

August 28, 2013

Garry Griffith, P.E. Georgia-Pacific LLC 951 County Street Milan, Michigan 48160-9610

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Former Plainwell Dam #2 Time-Critical Removal Action (Plainwell 2 TCRA)

Dear Mr. Griffith,

As you know, on June 11, 2013, EPA (accompanied by Georgia-Pacific LLC (GP) and Michigan Department of Environmental Quality (MDEQ)) inspected the river banks and floodplains of the Plainwell Dam #2 Area of the above referenced Superfund Site. This letter documents the findings of that inspection.

During the inspection, EPA observed erosion in the areas indicated in removal areas (RAs) 4B, 3A, 4A, and 2 (see Enclosure 1): EPA understands that these removal areas will be evaluated in detail in the upcoming 2013 Bank Conditions Monitoring Report that GP will be submitting to EPA later this year.

On June 11, 2013, GP also verbally requested changes to the monitoring program set forth in the currently approved work plan related to the Plainwell 2 TCRA. EPA received the same request in writing on August 12, 2013. EPA approves the requested change and enclosed hereto is a summary of the changes regarding bank stability and floodplain vegetation monitoring (Enclosure 2). These changes were discussed with the MDEQ and Michigan Department of Natural Resources on June 11, 2013.

EPA has completed its review of the 2012 Bank Conditions Monitoring Report and Addendums 1 and 2 thereof as well as GP's response to EPA's and MDEQ's comments. GP has addressed EPA's comments related to Plainwell Dam #2 and EPA has no further comments.

Please feel free to contact me should you have any questions.

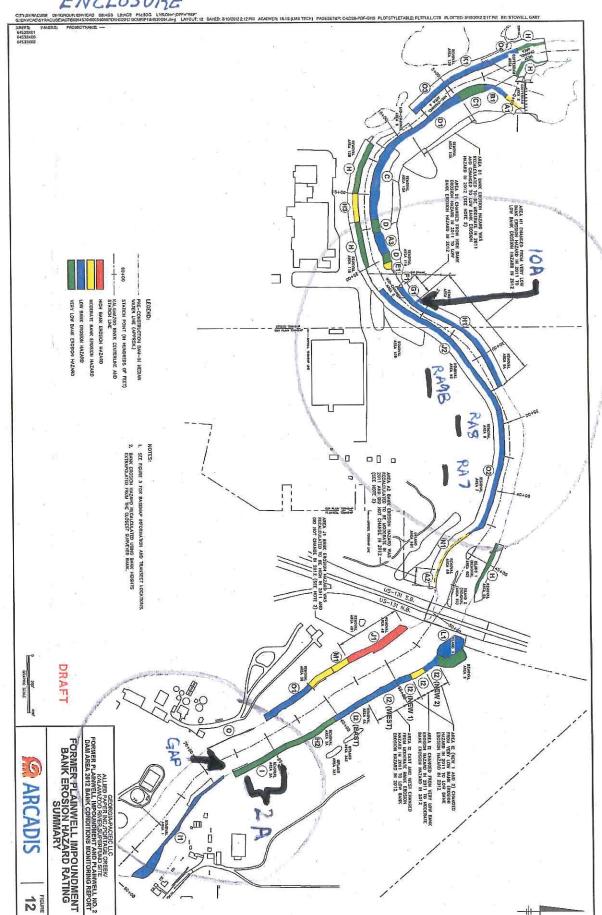
Sincerely,

Ramon Mendoza, On-Scene Coordinator U.S. EPA, Region 5 77 West Jackson Blvd. Mail Code SE-5J Chicago, Illinois 60604

CC: P. Buckholtz, MDEQ J. Alfano , MDEQ S.Hanshue, MDNR

Enclosure 1: Map of Removal Areas where EPA observed erosion Plainwell Dam 2

Enclosure 2: Summary of Proposed Changes to Plainwell #2 Post –TCRA Monitoring for 2013.





# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

August 27, 2013

Garry Griffith, P.E. Georgia-Pacific LLC (GP) 951 County Street Milan, Michigan 48160-9610

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Former Plainwell Impoundment Time-Critical Removal Action (TCRA)

Dear Mr. Griffith,

As you know, on June 11, 2013, EPA (accompanied by Georgia-Pacific LLC (GP), Michigan Department of Environmental Quality, Michigan Department of Natural Resources (MDNR) Michigan Attorney General's Office, and the U.S. Fish and Wildlife) inspected the river banks and floodplains in the Plainwell Impoundment Area of the above referenced Superfund Site. This letter documents the findings of that inspection.

During the inspection, EPA determined there was no active or threatened catastrophic failure of the river banks in the removal areas (RAs). EPA, however, observed erosion and evidence of threat of erosion in the following RAs (see enclosed map). Such erosion and evidence of threat of erosion, if not addressed over the long term may result in a release of PCB containing material into the Kalamazoo River:

- a) RA 2A has exposed residual materials on the bank; erosion is noted on the downstream 1/3 of RA 2A;
- b) There is an eroded shoreline gap between 1A and 2A and exposed residual material was observed;
- c) RA 10A, as in past inspections, continues to erode and expose residual material along its banks.
- d) Residual materials are exposed on the banks in some areas of RA 7, RA 8, and RA 9b. The river channel is unstable in these areas. Therefore these areas, although previously armored with coir log and rock, need additional rock armoring up to the full elevation of the bank. To address these concerns, GP has committed to planting live willow in the buffer zone and landward of the existing rock bank armoring to further increase the density and depth of roots and increase the soil holding capability of the bank. We understand this work will be completed in the fall of 2013.

e) A portion of the the rock armoring that GP installed in 2012 at RAs 4A and 6B is crumbling. Also, EPA found that some of the willow stakes at 6B had not survived. GP indicated that it will be replanting willow stakes in RA-6B in the fall of 2013. GP has reported to EPA that the crumbling of the rock (sandstone) is typical in the first freeze thaw cycle and that no further crumbling is expected in future years. If further crumbling occurs EPA may require installation of additional rock armoring.

We have completed our review of the 2012 Bank Conditions Monitoring Report and Addendums 1 and 2 thereto as well as GP's response to both EPA's and MDEQ's comments. We conclude that as the aforementioned reports pertains to the Plainwell Impoundment, GP has satisfied EPA's concerns and at this time, EPA requires no additional work from GP related to the 2007 TCRA.

Please feel free to contact me should you have any questions.

Sincerely,

Ramon Mendoza U.S. EPA, Region 5 77 West Jackson Blvd.

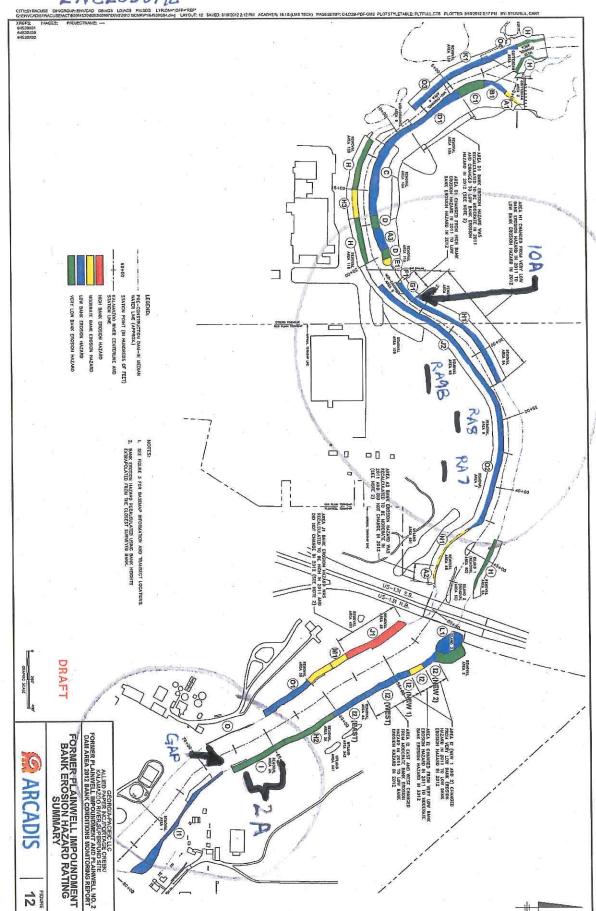
Mail Code SE-5J

Chicago, Illinois 60604

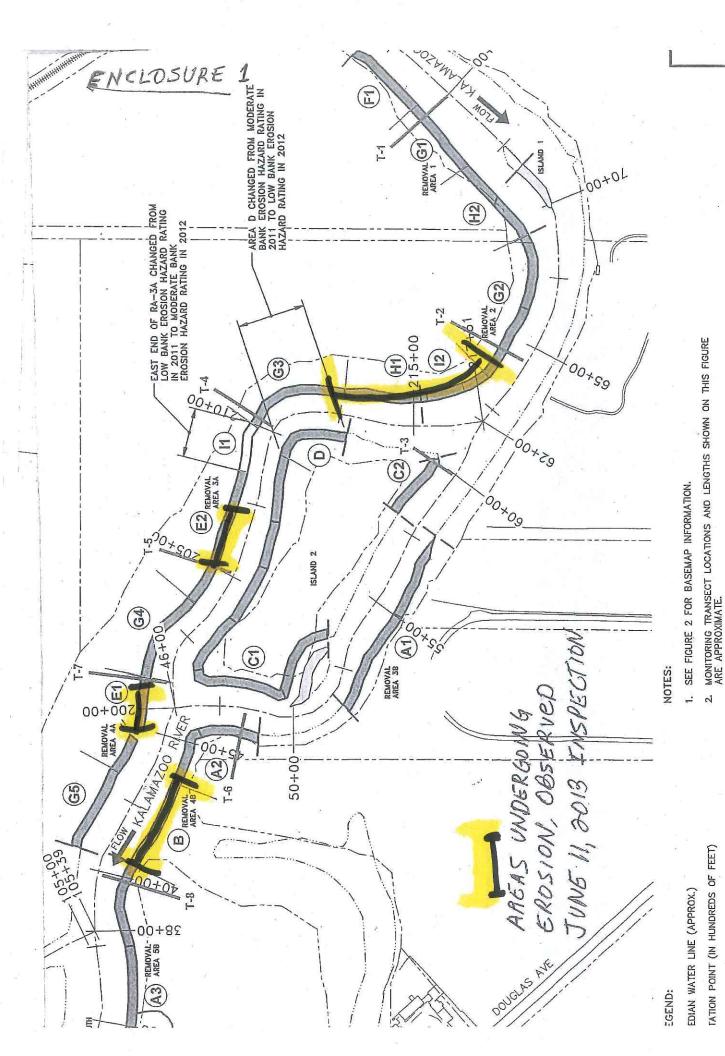
CC: P. Buckholtz, MDEQ
J. Alfano, MDEQ

S.Hanshue, MDNR

Enclosure: Map of Removal Areas where EPA observed erosion and evidence of threat of erosion.



\* 



ALAMAZOO RIVER CENTERLINE AND STATION LINE



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

# REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

August 28, 2013

Garry Griffith, P.E. Georgia-Pacific LLC 951 County Street Milan, Michigan 48160-9610

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Former Plainwell Dam #2 Time-Critical Removal Action (Plainwell 2 TCRA)

Dear Mr. Griffith,

As you know, on June 11, 2013, EPA (accompanied by Georgia-Pacific LLC (GP) and Michigan Department of Environmental Quality (MDEQ)) inspected the river banks and floodplains of the Plainwell Dam #2 Area of the above referenced Superfund Site. This letter documents the findings of that inspection.

During the inspection, EPA observed erosion in the areas indicated in removal areas (RAs) 4B, 3A, 4A, and 2 (see Enclosure 1): EPA understands that these removal areas will be evaluated in detail in the upcoming 2013 Bank Conditions Monitoring Report that GP will be submitting to EPA later this year.

On June 11, 2013, GP also verbally requested changes to the monitoring program set forth in the currently approved work plan related to the Plainwell 2 TCRA. EPA received the same request in writing on August 12, 2013. EPA approves the requested change and enclosed hereto is a summary of the changes regarding bank stability and floodplain vegetation monitoring (Enclosure 2). These changes were discussed with the MDEQ and Michigan Department of Natural Resources on June 11, 2013.

EPA has completed its review of the 2012 Bank Conditions Monitoring Report and Addendums 1 and 2 thereof as well as GP's response to EPA's and MDEQ's comments. GP has addressed EPA's comments related to Plainwell Dam #2 and EPA has no further comments.

Please feel free to contact me should you have any questions.

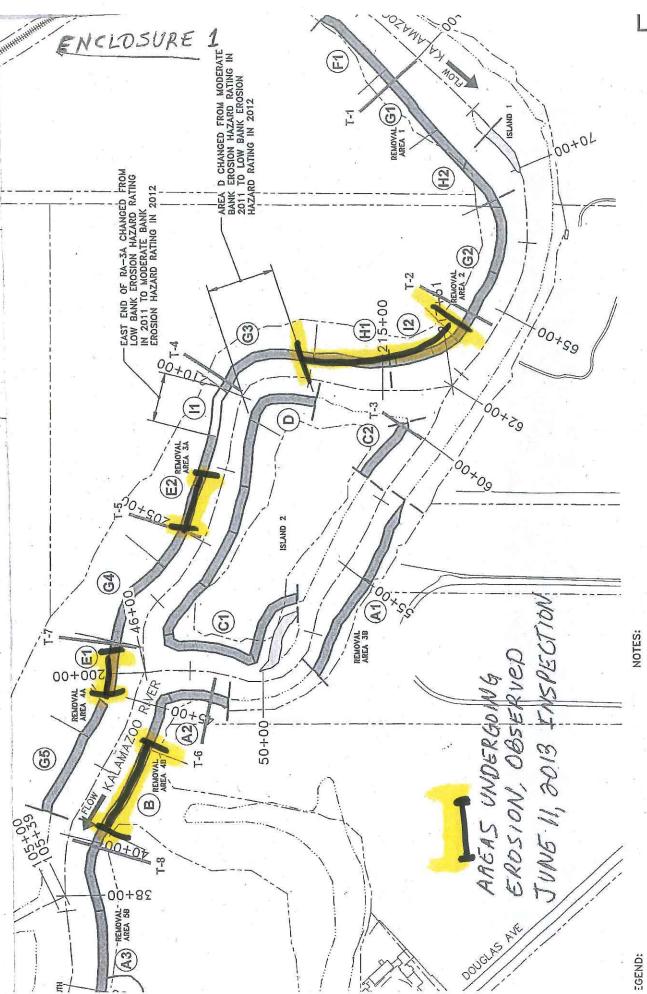
Sincerely,

Ramon Mendoza, On-Scene Coordinator U.S. EPA, Region 5 77 West Jackson Blvd. Mail Code SE-5J Chicago, Illinois 60604

CC: P. Buckholtz, MDEQ J. Alfano , MDEQ S.Hanshue, MDNR

Enclosure 1: Map of Removal Areas where EPA observed erosion Plainwell Dam 2

Enclosure 2: Summary of Proposed Changes to Plainwell #2 Post –TCRA Monitoring for 2013.



EDIAN WATER LINE (APPROX.)

SEE FIGURE 2 FOR BASEMAP INFORMATION.

MONITORING TRANSECT LOCATIONS AND LENGTHS SHOWN ON THIS FIGURE APPROXIMATE. ALAMAZOO RIVER CENTERLINE AND STATION LINE TATION POINT (IN HUNDREDS OF FEET)

# Proposed Changes to Plainwell No. 2 Dam Area Post-TCRA Monitoring for 2013

Prior Approach	Proposed Approach for 2013	Rationale
Tree and Shrub Survival Monitoring	86	
Tree and shrub count	Continue same	Document if survivability metric is met.
Bank Stability		
Visual observation and photo-documentation	Modify	Collect land-based and water-based photos to supplement discontinuation of BEHI and instrument survey
BEHI rating	Discontinue	Perform after site walk with regulatory oversight if areas of erosion are observed and it is decided that quantitative
Instrument survey at 14 locations with highest potential for erosion	Discontinue	erosion potential data is needed in those specific locations (both BEHI and survey)
Floodplain Vegetation Monitoring		
Herbaceous vegetation monitoring	Modify	Achieved ground cover metric in 2011 (99%) and 2012 (99.5%). Remove detailed quadrant count. Perform qualitative visual observation and photo documentation in conjunction with tree and shrub count.
Invasive Species Assessment	Continue same	Invasive species were identified in 2011 and 2012. A program for control of purple loosestrife is planned for 2013.

